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United States District Court
Western District of Washington

KATHERINE MOUSSOURIS, HOLLY
MUENCHOW, and DANA PIERMARINI
on behalf of herself and a class of those
similarly situated,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

Case No. 15-cv-1483 (JLR)

**DECLARATION OF SUZANNE
SOWINSKA**

I, Suzanne Sowinska, declare as follows:

1. I am a woman residing in Bozeman, Montana.
2. I have personal knowledge of the facts set forth in this Declaration, and could and would testify competently under oath if called as a witness. I understand that a class action lawsuit alleging employment discrimination has been filed against Microsoft Corporation

1 ("Microsoft"), and that this Declaration may be used by the plaintiffs in connection with this case.

2 3. I was employed in the Redmond, Washington office of Microsoft from
3 approximately 2000 to 2015. I was hired as a Documentation Lead, at or about Level 60, and
4 held several technical positions until I retired in 2015, as a Principle Program Manager, Level 65.
5 I was employed in various divisions during my time at Microsoft, the last four years of which
6 were in the Technology & Resource organization.

7 4. I have been provided with a copy of the Second Amended Complaint and
8 am familiar with the allegations it sets forth in the class action against Microsoft. I believe that
9 my own experiences at Microsoft are similar to those described in the Complaint.

10 5. When I became manager and participated in the promotion and
11 compensation decision-making process, I noticed that women were disadvantaged compared to
12 men with no greater qualifications. I also observed that men's contributions and projects were
13 valued more highly than similar projects managed by women, including my own, even when the
14 technical difficulty and value to the company was greater for the women's projects.

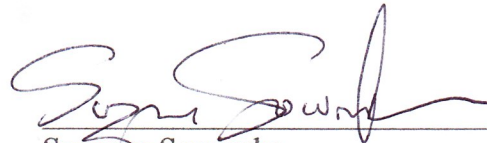
15 6. I believe that Microsoft discriminated against women in the way it
16 compensated me and other women, including by paying men more than women for performing
17 comparable work.

18 7. In my capacity as a group manager and Chief of Staff for several company-
19 wide leadership teams, female employees and fellow managers confided in me about their
20 experiences with gender discrimination and sexual harassment. I frequently heard stories, and
21 shared my own experiences, regarding women's contributions being undervalued and women
22 being denied professional development opportunities. I also strategized with other managers
23 about how to handle incidents of sexual harassment and the culture of gender discrimination that
24 managers noticed in their groups. For example, I had several conversations with another group
25 manager on my team regarding his concerns about sending a female employee to meetings with
26 senior IT employees who failed to pay attention to her and obviously stared at her breasts.
27 Another colleague informed me of an incident in which a male Director groped a woman while
28 intoxicated at a company event. I also spoke with women about the pressure we felt to hit the

1 sweet spot between being perceived as “too timid” or “overly passionate” and “too harsh” in
2 Microsoft’s male-dominated culture. In fact, in 2013, a male manager told me that he had initially
3 given me a performance review score of 2 that he changed to a lower score of 3 as a part of a
4 calibration meeting. When I questioned the change, he said the reason he gave me a lower
5 performance score was because I did not smile enough and that the team I managed, also all
6 women, also did not smile enough. He also stated that my team “wasn’t fun.” When I spoke with
7 a peer male manager about this, he stated that it didn’t help that one of the members of my team
8 had dyed her hair blonde, and he thought it made her appear “dumber” and “incompetent.”

9
10 I declare under penalty of perjury under the laws of the United States that the foregoing is
11 true and correct to the best of my knowledge.

12 Executed this 27 day of October 2017, in Bozeman, MT.

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15 Suzanne Sowinska
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